

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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In re: ROBERT W. FLESSAS  
and LAURIE A. FLESSAS,  
Debtor(s).

Case No.: 2008-31132-PP-13  
Chapter 13

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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Robert W. Flessas and Laurie A. Flessas have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your Rights May be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court  
517 E. Wisconsin Avenue  
Room 126  
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

MILLER & MILLER LAW, LLC  
Attorney James L. Miller  
735 West Wisconsin Avenue  
Suite 600  
Milwaukee, Wisconsin 53233  
(414) 277-7742  
(414) 277-1303

You must also mail a copy to:

Attorney James L. Miller  
MILLER & MILLER LAW, LLC  
735 West Wisconsin Avenue  
Suite 600  
Milwaukee, Wisconsin 53233

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is

  X   the Debtor;

       the Chapter 13 Trustee (post-confirmation only);

       the holder of an unsecured claim (Name: \_\_\_\_\_ )  
(post-confirmation modification only).

2. This is a request to modify a Chapter 13 Plan:

A.   X   post-confirmation;

B.        pre-confirmation;

- i.   X   Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b);
- ii.        Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:

**All creditors of record.**

3. The Proponent wishes to modify the Chapter 13 Plan to do the following:

**Increase plan payments to maintain feasibility of plan.**

4. The reason(s) for the modification is/are: **Increase plan payments to maintain feasibility of plan.**
5. A. X The Chapter 13 Plan confirmed or last modified on March 3, 2009 is modified as follows:
- B. \_\_\_\_ The unconfirmed Chapter 13 Plan dated \_\_\_\_\_ is modified as follows:
1. **Debtors will increase their Chapter 13 plan payment from \$1,400.00 monthly to \$2,120.00 monthly to maintain feasibility. Mrs. Flessas will pay \$530.00 semi-monthly through her payroll deduction and Mr. Flessas will pay \$1,060 monthly directly to the Trustee's lockbox.**

All remaining terms and provisions of the plan are unaffected unless specifically addressed herein. In the event of a conflict between the original plan and the modification set forth above, the later shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

CERTIFICATION

1. I/We, \_\_\_\_\_, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

\_\_\_\_\_  
Debtor

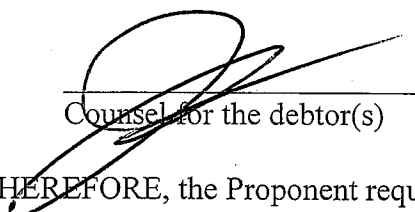
\_\_\_\_\_  
Date

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

OR

2. I James Miller, attorney for debtor(s) MR & MRS Flossas, certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

  
\_\_\_\_\_  
Counsel for the debtor(s)

9/14/11  
\_\_\_\_\_  
Date

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated: September 14, 2011

Attorneys for

Miller & Miller, LLC.

at City, State.

By:

James L. Miller

Milwaukee, Wisconsin

Bar No.

1000569

MILLER & MILLER LAW, LLC  
James L. Miller  
735 West Wisconsin Avenue  
Suite 600  
Milwaukee, Wisconsin 53233  
(414) 277-7742  
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Case No.: 2008-31132-PP-13  
Chapter 13  
CERTIFICATE OF MAILING

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Label Matrix for local noticing  
0757-2  
Case 08-31132-pp  
Eastern District of Wisconsin  
Milwaukee  
Wed Sep 14 12:02:29 CDT 2011  
Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

GE Money Bank  
Attn: Ramesh Singh  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

JPMorgan Chase Bank  
c/o O'Dess and Associates, S.C.  
1414 Underwood Avenue  
Suite 403  
Wauwatosa, WI 53213-2653

PRA Receivables Management, LLC  
PO Box 41067  
Norfolk, VA 23541-1067

(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

eCAST Settlement Corporation  
POB 35480  
Newark, NJ 07193-5480

AT&T Universal Card  
P.O. Box 44167  
Jacksonville, FL 32231-4167

(p)AMERICAN GENERAL  
P O BOX 3251  
EVANSVILLE IN 47731-3251

Attorney Abigail O.Dess  
1414 Underwood Ave. Ste 403  
Wauwatosa, WI 53213-2653

Attorney Ken Lamance  
71 Langton Street  
San Francisco, CA 94103-3915

Attorney Matthew J. Tadych  
5232 W Oklahoma Ave, Suite 200  
Milwaukee, WI 53219-4599

Bank of America  
P.O. Box 15026  
Wilmington, DE 19850-5026

Capital One  
P.O. Box 30285  
Salt Lake City, UT 84130-0285

Chase  
P.O. Box 15298  
Wilmington, DE 19850-5298

Chase Bank USA NA  
by eCAST Settlement Corporation  
as its agent  
POB 35480  
Newark NJ 07193-5480

Chicago Association of Realtors/MLS  
P.O. Box 72258  
Chicago, IL 60678-7252

Citi Mortgage  
1000 Technology Drive  
Saint Charles, MO 63368-2240

CitiCards  
P.O. Box 6241  
Sioux Falls, SD 57117-6241

CitiCards  
P.O. Box 44167  
Jacksonville, FL 32231-4167

Collection Experts, Inc.  
1305 N. Barker Rd.  
Brookfield, WI 53045-5230

(p)DELL FINANCIAL SERVICES  
P O BOX 81577  
AUSTIN TX 78708-1577

(p)DISCOVER FINANCIAL SERVICES LLC  
PO BOX 3025  
NEW ALBANY OH 43054-3025

Discover Bank/DFS Services LLC  
POB 3025  
New Albany Ohio 43054-3025

Don Jentges  
N91W27474 Red Fox Run  
Hartland, WI 53029-9098

Elite Fitness & Racquet Clubs  
13825 W. Burlleigh Road  
Brookfield, WI 53005-3099

Ella - Tho, LLC  
P.O. Box 1592  
Brookfield, WI 53008-1592

Ezedin Sadeghi D.D.S., M.S.  
P.O. Box 510567  
New Berlin, WI 53151-0567

GE Consumer Finance  
For GE Money Bank  
dba BOMBARDIER/GEMB  
PO Box 960061  
Orlando FL 32896-0661

GE Consumer Finance  
For GE Money Bank  
dba CARE CREDIT/GEMB  
PO Box 960061  
Orlando FL 32896-0661

GE Financial  
P.O. Box 981127  
El Paso, TX 79998-1127

GE Money Bank/Bombardier  
P.O. Box 981127  
El Paso, TX 79998-1127

GEMB/Care Credit  
P.O. Box 960061  
Orlando, FL 32896-0061

Jentges Enterprises, a wisconsin partner  
N91 W27474 Red Fox Run  
Hartland, WI 53029-9098

LNVN Funding LLC its successors and assigns  
assignee of Citibank  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

LegalMatch C/O Attorney Ken Lamance  
71 Langton Street  
San Francisco, CA 94103-3915

Milwaukee Journal Sentinel  
PO Box 2929  
Milwaukee, WI 53201-2929

Northwestern Mutual  
720 E. Wisconsin Ave.  
Milwaukee, WI 53202-4703

Northwestern Mutual Credit Union  
720 E. Wisconsin Ave. RM E02D  
Milwaukee, WI 53202-4703

Pitney Bowes  
2225 American Drive  
Neenah, WI 54956-1005

Pitney Bowes Inc  
27 Waterview Dr  
Shelton CT 06484-4361

PitneyBowes  
2225 American Drive  
Neenah, WI 54956-1005

Purchase Power  
P.O. Box 856042  
Louisville, KY 40285-6042

Recovery Management Systems Corporation  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Richard North Associates, Inc.  
P.O. Box 963  
Buffalo, NY 14226-0963

Robert and Barbara Dugan  
19601 West Bluemound Road  
Brookfield, WI 53045-5974

(p)SPRINT NEXTEL CORRESPONDENCE  
ATTN BANKRUPTCY DEPT  
PO BOX 7949  
OVERLAND PARK KS 66207-0949

Thompson West  
610 Opperman Drive  
Egan, MN 55123-1340

Thompson West  
P.O. Box 64833  
Saint Paul, MN 55164-1804

Time Warner Cable  
Retention Department  
1320 North Martin Luther King Dr.  
Milwaukee, WI 53212-4002

US Bank/Retail Payment Solutions  
PO Box 5229  
Cincinnati, OH 45201-5229

WE Energies  
333 W. Everett Street  
Rm A130 Bankruptcy Dept.  
Milwaukee, WI 53203

WFNNB/Chadwick  
P.O. Box 659728  
San Antonio, TX 78265-9728

WORLD FINANCIAL NETWORK NATIONAL BANK  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

(p)CHASE CARD SERVICES  
201 NORTH WALNUT STREET  
ATTN MARK PASCALE  
MAIL STOP DE1-1406  
WILMINGTON DE 19801-2920

Washington Mutual home Loans  
Bankruptcy Department  
7255 Baymeadows Way  
Jacksonville, FL 32256-6851

Waterstone Bank  
11200 W. Plank Court  
Milwaukee, WI 53226-3250

Waukesha County  
County Treasurer's Office  
1320 Pewaukee Rd. Rm 110  
Waukesha, WI 53188-3878

Waukesha Memorial Hospital  
c/o State Collection Service, Inc.  
2509 S. Stoughton Road  
P.O. Box 6250  
Madison, WI 53716-0250

WeEnergies  
333 W. Everett Street  
Rm A130 Bankruptcy Dept.  
Milwaukee, WI 53203

Yellow Book/Mid-West REG  
RMS  
P.O. Box 5471  
Mount Laurel, NJ 08054-5471

James L. Miller  
Miller & Miller Law, LLC  
735 West Wisconsin Avenue  
Suite 600  
Milwaukee, WI 53233-2413

Laurie A Flessas  
1805 W. Wisconsin Avenue  
Brookfield, WI 53045

Robert W. Flessas  
N28 W26946 Woodland Drive  
Pewaukee, WI 53072-4454

Thomas J. King  
P.O. Box 3170  
Oshkosh, WI 54903-3170

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

US BANK  
POB 5229  
CINCINNATI, OH 45201

American General Finance  
1407 Summit Ave.  
Waukesha, WI 53188

Dell Financial Services  
c/o Customer Service Correspondence Dept  
P.O. Box 81577  
Austin, TX 78708-1577

(d)Dell Financial Services, LLC  
c/o Resurgent Capital Services  
Po Box 10390  
Greenville, SC 29603-0390

Discover Bank  
P.O. Box 15251  
Wilmington, DE 19886-5251

(d)Elan Financial Services  
P.O. Box 6354  
Fargo, ND 58125-6354

Sprint PCS  
P.O. Box 219554  
Kansas City, MO 64121

(d)US Bank  
205 W. 4th Street  
Cincinnati, OH 45202

(d)US Bank N.A.  
P.O. Box 2188  
Oshkosh, WI 54903-2188

WaMU  
P.O. Box 660487  
Dallas, TX 75266

(d)Washington Mutual/Prov  
PO Box 660509  
Dallas, TX 75266

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)AT&T Universal card  
PO Box 44167  
Jacksonville, FL 32231-4167

(u)Myfax.com

(u)Vonage

(d)eCAST Settlement Corporation  
POB 35480  
Newark NJ 07193-5480

End of Label Matrix  
Mailable recipients 64  
Bypassed recipients 4  
Total 68